

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

SUPERSPEED, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:12-cv-01688
	§	
GOOGLE, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

**PLAINTIFF SUPERSPEED, LLC'S INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), plaintiff SuperSpeed LLC (“SuperSpeed”), makes these Initial Disclosures. SuperSpeed reserves the right to amend or supplement these disclosures as discovery progresses. SuperSpeed also reserves the right to object to the admissibility of any information disclosed.

**(i) INDIVIDUALS**

The individuals listed below may have discoverable information relevant to the parties' claims, counterclaims, and defenses. In particular, they may have information regarding the parties; the design, testing, manufacturing, and sale of SuperSpeed and Google products; the application and prosecution of SuperSpeed's patents; SuperSpeed's allegations and claimed damages; SuperSpeed's organization, business practices, and financial results; and the history and general practices of the industry and market for data caching software products.

1. Eric Dickman  
Managing Partner  
SUPERSPEED, LLC  
Millbrook Park  
327E Boston Post Road  
Sudbury, MA 01776  
978-443-5106, Ext. 125

Mr. Dickman has knowledge concerning the development, testing and marketing of SuperCache software and of the technologies disclosed in U.S. Patent 5,918,244. Mr. Dickman also has knowledge concerning SuperSpeed's business practices, Google's infringing products, and a reasonable royalty for a license under the patents at issue.

2. Pamela Gleeson  
678 NH Route 123  
Sharon, NH 03458  
(603) 924-4084

Ms. Gleeson has knowledge concerning SuperSpeed's past sales and marketing practices, SuperSpeed's past customer relations, the development of SuperCache software, and SuperSpeed's past business practices.

3. Ian Percival  
2640 Dark Oak Court  
Oviedo, FL 32766  
(407) 281-2650

Mr. Percival has knowledge concerning the development and testing of SuperCache software and of the technologies disclosed in U.S. Patent 5,918,244. He also has knowledge concerning the development and testing of the SCS module used in TurboCache.

4. Helen Sicotte  
46 Washington Avenue  
Natick, MS 01760  
978-443-5106 x 110

Ms. Sicotte has knowledge concerning SuperSpeed's past business and administrative practices. Ms. Sicotte was an EEC (predecessor to SuperSpeed) employee during the development of SuperCache.

5. Neil Sullivan  
SUPERSPEED, LLC  
Millbrook Park  
327E Boston Post Road  
Sudbury, MA 01776  
978-443-5106

Mr. Sullivan is a Vice President of SuperSpeed. He is knowledgeable about sales of SuperSpeed's products.

6. Agnes Doyle  
SUPERSPEED, LLC  
Millbrook Park  
327E Boston Post Road  
Sudbury, MA 01776  
978-443-5106

Ms. Doyle is a part-time employee of SuperSpeed. She is knowledgeable about SuperSpeed's accounting systems and financial data.

7. Michael Horniak  
SUPERSPEED, LLC  
Millbrook Park  
327E Boston Post Road  
Sudbury, MA 01776  
978-443-5106

Mr. Horniak is a Vice President of SuperSpeed. He is knowledgeable about customer support issues for SuperSpeed's current products.

8. Ton Van den Hoven  
The Netherlands

Mr. Van den Hoven was a distributor of SuperSpeed products in the 1990s. He has knowledge concerning certain customers' use of SuperCache.

9. Peter Smith  
16 Lupin Grove  
Rogerstone  
New Port, Qwent NP10 9LJ, UK  
+44 (1633) 894205

Mr. Smith has knowledge concerning the flow charts used in the prosecution of various SuperSpeed Patents, including SuperCache. Mr. Smith was also the developer of SuperDisk for VMS. Mr. Smith contributed to the porting of SuperCache from VAX-VMS to Alpha-VMS.

10. Robert Asher  
Bromberg & Sunstein, LLP  
125 Summer Street  
Boston, MA 02110  
617-443-9292, Ext. 224

Mr. Asher has knowledge concerning the prosecution of various SuperSpeed Patents.

11. Joseph Worrall

Mr. Worrall has knowledge concerning the development of TurboCache and TurboDisk.

12. Chris Yetman  
2481 Ginny Way  
Lafayette, CO 80026  
(720) 888-2810

Mr. Yetman has knowledge concerning the testing of SuperCache.

13. Barry Zaltman  
(617) 582-4515

Mr. Zaltman has knowledge concerning the marketing and sales of various SuperSpeed products.

14. Dorothy Ripaldi  
508-966-2170

Ms. Ripaldi has knowledge concerning marketing of TurboCache, TurboDisk, SuperCache and SuperDisk.

15. Peter Cholakis  
(781) 821-2440 x117

Mr. Cholakis has knowledge concerning the field testing of SuperCache at Nemonix Corporation, and the field testing and ultimate sale of SuperCache at the Naval Underwater Systems Center in Newport, RI.

16. Jim Davis  
+44 (0) 1509 501100

Mr. Davis has knowledge concerning the field testing of SuperCache.

17. Peter Johnson

Mr. Johnson has knowledge concerning the marketing communications by DEC of SuperCache for the Alpha Processor.

18. Pauline Nist

Ms. Nist has knowledge concerning the field testing of SuperCache by DEC.

19. Shawn Diehl  
(978) 703-4407

Mr. Diehl has technical knowledge concerning certain of SuperSpeed's products, including SuperCache for Windows Operating Systems.

20. Michael Dempsey  
Boulder, CO

Mr. Dempsey has technical knowledge concerning certain of SuperSpeed's products, including testing of SuperCache at DEC on Alpha based platforms, and the development of SuperDisk for Windows NT (now called SuperCache).

**All SuperSpeed employees should be contacted only through SuperSpeed's counsel.**

SuperSpeed reserves the right to identify additional persons having information bearing significantly on the claims and/or defenses in this litigation when the identity of such persons becomes known and upon entry of an appropriate Protective Order by the Court. SuperSpeed believes these additional persons will include employees and former employees of defendant Google, customers of Google, and other entities or individuals who have formed business relationships with Google.

**(ii) DOCUMENTS**

The following documents and things may be relevant to the disputed facts in this litigation:

1. U.S. Patent 5,918,244 and materials submitted to the United States Patent and Trademark Office in connection with the applications for this patent;
2. Back-up tapes of source code disks relating to the development of SuperCache;
3. Source code relating to the development of Google Drive and Google Docs;

4. SuperSpeed customer and licensing records;
5. Google website;
6. Manuals relating to Google Docs and Google Drive;
7. Manual relating to SuperCache Version 1.404.

**(iii) DAMAGES CALCULATIONS**

SuperSpeed intends to seek a reasonable royalty on all products that infringe its patents. Because this is an exceptional case, SuperSpeed also intends to seek reasonable and necessary attorney's fees. At this time, SuperSpeed does not have sufficient information to estimate damages with precision.

**(iv) INSURANCE**

Not applicable.

Respectfully submitted,

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Attorneys for Plaintiff  
SuperSpeed, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

*/s/Neal S. Manne*  
Neal S. Manne